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Attorneys for Defendants
Seoul Semiconductor Co., Ltd. and
Seoul Semiconductor, Inc.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

Nichia Corporation,

Plaintiff,

v.

Seoul Semiconductor Co., Ltd., Seoul
Semiconductor, Inc.,

Defendants.

No. 3:06-CV-0162 (MMC)

**DEFENDANTS SEOUL
SEMICONDUCTOR CO., LTD. AND
SEOUL SEMICONDUCTOR, INC.,’S
LISTING OF NICHIA CORP.’S
DISCOVERY ADMISSIONS**

The following are Nichia's admissions which Seoul intends to introduce at trial pursuant to Rule 36(b).

SSC AND SSI REQUEST FOR ADMISSION NO. 20:

Admit that side view LEDs, including the Seoul Semiconductor's 902 series LED and Nichia series 335 LED, are a component in back lighting units.

RESPONSE TO REQUEST FOR ADMISSION NO. 20:

Admitted, to the extent that is one of the uses of such side view LEDs.

SSC AND SSI REQUEST FOR ADMISSION NO. 21:

Admit that back lighting units are a further component of liquid crystal display modules in which side view LEDs, including the Seoul Semiconductor's 902 series LED and Nichia series 335 LED, are a component within the back lighting units.

RESPONSE TO REQUEST FOR ADMISSION NO. 21:

Admitted, to the extent that side view LEDs can be a component within the backlighting units and that Seoul Semiconductor 902 series LED and the Nichia series 335 LED are example [sic] of side view LEDs. Denied as to the remainder, as it is not known whether all liquid crystal display modules contain backlighting units.

SSC AND SSI REQUEST FOR ADMISSION NO. 22:

Admit that liquid crystal display modules are a further component of larger consumer end products such as cellular phones, personal digital assistants, and MP3 players in which side view LEDs, including the Seoul Semiconductor's 902 series LED and Nichia series 335 LED, are a component within the back lighting units that go into the liquid crystal display modules.

RESPONSE TO REQUEST FOR ADMISSION NO. 22:

Admitted, to the extent that one use of liquid crystal displays is as a component of larger consumer end products. Admitted, to the extent that one use of Seoul Semiconductor's 902 series LED and the Nichia 335 series LED, is as a further component of larger consumer end products.

SSC AND SSI REQUEST FOR ADMISSION NO. 34:

Admit Nichia's Korean Design Patent Number 0294490 was invalidated.

RESPONSE TO REQUEST FOR ADMISSION NO. 34:

Nichia objects to this Request, because it lacks relevance. Subject to the foregoing and the General Objections, admitted.

DATED: August 14, 2007

Bingham McCutchen LLP

By: _____/s/
Judith S. H. Hom
Attorneys for Defendants
Seoul Semiconductor Co., Ltd.
and Seoul Semiconductor, Inc.